

**CLIFFORD
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Via ECF

The Honorable Sarah Netburn
 Judge, United States District Court
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

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June 13, 2017

In re Terrorist Attacks on September 11, 2001, 03 MDL 1570

Dear Judge Netburn,

We write to you on behalf of Defendants' Executive Committee and Plaintiffs' Executive Committees ("Committees") regarding the Court's June 19, 2017 deadline for the submission of a joint proposed deposition protocol.

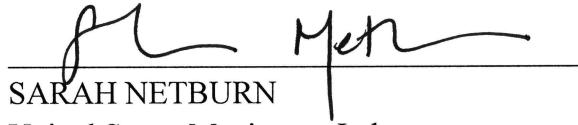
The parties collectively met and conferred in good faith at Clifford Chance's Washington D.C. office this afternoon and were able to make substantial progress toward a joint proposal. We have agreed to circulate a revised proposal reflecting that progress and to continue to confer.

To permit sufficient time to continue our dialogue, the parties jointly request that the Court's deadline to submit a joint proposal be extended to July 7, 2017. We appreciate the Court's indulgence while the parties continue to make productive progress.

We are grateful for the Court's attention to this matter.

The parties' request is GRANTED. The PEC and DEC may submit a joint proposed deposition protocol and/or letters describing any points of disagreement to the Court by Friday, July 7, 2017.

SO ORDERED.



SARAH NETBURN
 United States Magistrate Judge

June 14, 2017
 New York, New York